

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs move the Court to consider whether certain material should be sealed. Plaintiffs file these materials under seal because they contain materials previously filed under seal by Uber.

Material To Be Filed Under Seal

The materials to be filed under seal are attachments to Plaintiffs' Reply in Support of their Motion to Compel Custodial Discovery, which contain materials previously filed under seal by Uber. Thus, Plaintiffs request the Court consider whether the following should be filed under seal:

Document	Description	Designating Party
Exhibit A to Reply In Support of Motion to Compel Custodial Discovery	Chart previously filed under seal by Uber	Uber
Exhibit B to Reply In Support of Motion to Compel Custodial Discovery	Chart previously filed under seal by Uber	Uber

Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish that all of the designated material is sealable, and must “file a statement and/or declaration as described in subsection (c)(1)” of the Local Rules. None of the information at issue was marked confidential by Plaintiffs.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Roopal P. Luhana in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: September 17, 2024

Respectfully submitted,

By: /s/ Roopal P. Luhana

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Co-Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on September 17, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Roopal P. Luhana
Roopal P. Luhana